

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	Case No. 1:19-CR-559-2
)	
Plaintiff,)	
)	JUDGE SARA E. LIOI
v.)	
)	
DEEPAK RAHEJA, <i>et al.</i> ,)	
)	<u>UNOPPOSED MOTION</u>
)	<u>TO PERMIT TRAVEL OUTSIDE OF</u>
Defendants.)	<u>NORTHERN DISTRICT OF OHIO AND</u>
)	<u>OUTSIDE OF THE UNITED STATES</u>
)	<u>AND REQUEST FOR RETURN</u>
)	<u>OF PASSPORT TO FACILITATE</u>
)	<u>INTERNATIONAL TRAVEL</u>
)	

Now comes Defendant, Gregory Hayslette, by and through the undersigned counsel, with the consent of the United States, and moves this Court for an order allowing him to travel outside of the Northern District of Ohio and outside of the United States. Gregory Hayslette has been fully compliant with the terms of his pretrial release, and requests the opportunity travel to Florida with his girlfriend and her children for the holidays and for work purposes in January. With respect to work, Mr. Hayslette has obtained new employment and needs to attend mandatory new hire training in St. Louis on January 6th thru January 10th, 2020, on the job training (sales calls with a training sales person) in Tampa on January 13th thru January 16th, and then travel to the company's headquarters in Germany to attend a required sales meeting and to conduct further required training and education on January 22nd thru January 26th, 2020. Accordingly, Mr. Hayslette respectfully requests permission to travel outside of the Northern District of Ohio during the dates of:

1. December 30th, 2019 thru January 4th, 2020 (travel to Naples, Florida with girlfriend and her children to visit with his girlfriend's family); and

2. January 6th, 2020 thru January 10th, 2020 (new job orientation and training, St. Louis, Missouri).
3. January 13th, 2020 thru January 16th, 2020 (on the job training with another sales person/trainer performing sales calls)

And outside of the United States during the dates of:

1. January 22nd thru January 26th, 2020 (mandatory sales meeting and training in Germany for new job).

Mr. Hayslette requests that his passport be returned to him to allow travel outside of the United States, and then it will be promptly returned to the custody of the United States upon his return. Mr. Hayslette will advise and coordinate with Pretrial Services in advance of any and all travel, and will provide detailed information regarding his itinerary in advance of any travel. While traveling, Mr. Hayslette will comply with all instructions and protocols instituted by Pretrial Services. Counsel for the government and has no objection to this motion and Pretrial Services has been advised of Mr. Hayslette's requests.

Respectfully submitted,

/s/Colin R. Jennings

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*Attorney for Defendant,
Gregory Hayslette*

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/Colin R. Jennings

Colin R. Jennings

Attorney for Defendant,
Gregory Hayslette